



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 1, 2020

**BY ECF and EMAIL**

The Honorable Katherine Polk Failla  
Thurgood Marshall  
United States Courthouse  
40 Foley Street  
New York, New York 10007

**Re: *United States v. Clifford Taylor*, 19 Cr. 410 (KPF)**

Dear Judge Failla:

The Government respectfully submits this letter, with the consent of defense counsel, to propose for the Court's consideration the below conditions of release in the event the Court grants the defendant's motion for temporary release during the current COVID-19 pandemic, pursuant to Title 18, United States Code, Section 3142(i) (the "Motion"). Further, the Government respectfully requests, with the consent of defense counsel, that in the event the Court grants the Motion the Court terminate the defendant's temporary release and return the defendant to pretrial detention as soon as the Court concludes that the defendant no longer faces the acute health risk posed by the current circumstances.

1. Personal recognizance bond in the amount of \$100,000, to be signed by the defendant and co-signed by Ms. Gwendolyn Thompson, Jose Monche, and, subject to approval by the United States Attorney's Office, Marvin Ferguson.
2. All mandatory conditions of release included in the Court's standard "Order Setting Conditions of Release" form.
3. Pretrial Services supervision as directed by the Pretrial Services Office.
4. Surrender of all passports and other travel documents and no applications for new or replacement travel documents.
5. Drug testing as directed by the Pretrial Services Office.
6. The defendant shall not possess a firearm, destructive device, or other weapon.

7. Home incarceration at Ms. Thompson's residence located at [REDACTED],<sup>1</sup> with electronic monitoring by means chosen at the discretion of the Pretrial Services Office. The defendant shall be confined to the residence of Ms. Thompson 24-hours per day except for emergency medical visits. Any other release from the residence must be approved by either the Pretrial Services Office or by the Court on application from defense counsel.
8. No visitors to the residence of Ms. Thompson except for family members of Ms. Thompson or the defendant.
9. For fourteen days after the defendant's release, Ms. Thompson, together with the defendant, must have daily contact with the Pretrial Services Office through videoconferencing technology. Thereafter, the defendant shall maintain contact with the Pretrial Services Office as directed by the Pretrial Services Office.
10. The defendant shall not use or possess any narcotic drug or controlled substance unless prescribed by a licensed medical practitioner.
11. The defendant shall be released upon the approval by the Pretrial Services Office of Ms. Thompson's residence as a place for home incarceration, the signature of Ms. Thompson (which may be executed remotely and electronically), and the defendant's personal signature, or, alternatively, upon his attorney signing for him if his attorney certifies in writing to this Court that (i) the defendant has authorized his attorney to sign on his behalf, (ii) his attorney has explained the conditions of temporary release to the defendant, and (iii) the defendant has represented to his attorney that he fully understands and intends to comply with those conditions. All other conditions shall be satisfied within seven days of the date of this Order.
12. The Pretrial Services Office is directed to immediately alert the Court, the Government and defense counsel of any violation of the above conditions, without need for a formal violation petition. The defendant is hereby notified that violating the conditions of release will likely result in revocation of this temporary release.

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<sup>1</sup> The Government is redacting references to Ms. Thompson's address, and has filed an unredacted version of this submission with the Court.

13. Defense counsel shall submit a status update letter to the Court once a week after consultation with the Government, informing the Court as to the defendant's status, health, and compliance with the conditions of release.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by: /s/  
Daniel H. Wolf  
Assistant United States Attorney  
(212) 637-2337

cc: Florian Miedel (by ECF and email)